

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

ANN and MUHAMMAD CHAUDHRY

Plaintiffs,

v.

AMERICAN FAMILY MUTUAL
INSURANCE COMPANY, a foreign insurer,

Defendant.

No. 3:20-cv-06005-RSL

**STIPULATED MOTION TO EXTEND
EXPERT DISCLOSURE &
DISCOVERY DEADLINE**

COME NOW, the Parties by and through their counsel of record, and respectfully move this Court, via stipulation, as follows:

I. STIPULATION

1. The Parties make this motion in good faith and not for the purpose of delay.
2. This is a first-party insurance coverage dispute, in which the plaintiffs, Ann Chaudhry and Muhammad Chaudhry (“Plaintiffs Chaudhry”), assert claims for breach of contract, bad faith, breach of the Washington Consumer Protection Act (“CPA”), violations of the Insurance Fair Conduct Act (“IFCA”), and for fees and

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costs, including *Olympic Steamship* attorney fees. Defendant American Family Mutual Insurance Company, S.I. (“American Family”) denies any and all liability.

3. Pursuant to the Minute Order Setting Trial Date & Related Dates [ECF 15], Reports from Expert Witnesses under FRCP 26(a)(2) are currently due on **September 8, 2021**. The deadline to complete discovery is **November 7, 2021**.
Id.

4. On March 10, 2021, this Court entered an order granting Stipulated Leave for Withdrawal and Substitution of Counsel, wherein Pfau Cochran Vertetis Amala, PLLC was granted leave to withdraw as counsel of record for Plaintiffs Chaudhry and Scuderi Law Offices, P.S., was granted leave to substitute in as counsel of record for Plaintiffs Chaudry. *See* ECF 17.

5. Though the Parties have diligently been engaging in discovery, the Parties agree that the current deadlines are not sufficient to obtain relevant necessary discovery and file timely rebuttal expert reports.

6. The Parties have thus discussed the current deadlines for expert disclosure and discovery completion and agree that a 45-day extension of these two (2) deadlines for good cause is needed to obtain relevant necessary discovery and file timely rebuttal expert reports.

7. As such, the Parties request to extend both the discovery cutoff as well as the deadline to disclose expert rebuttal disclosures as follows.

Events	Current Deadline [ECF 15]	Proposed Deadline
Reports from expert witnesses under FRCP 26(a)(2) due	September 8, 2021	October 25, 2021
Discovery Completed By	November 7, 2021	December 22, 2021

8. The Parties are not requesting an extension of any additional deadlines on the Scheduling Order at this time.

9. For the above reasons, the Parties jointly request that the Court grant this stipulated motion to extend the deadlines as set forth above.

RESPECTFULLY SUBMITTED this 19th day of August 2021.

WATHEN | LEID | HALL | RIDER, P.C.

SCUDERI LAW OFFICES, P.S.

s/ Kimberly Larsen Rider

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II. ORDER

IN CONFORMITY with the foregoing Stipulation, **IT IS SO ORDERED.**

The Court shall issue an amended case scheduling Order in conformity herewith.

Dated this 20th day of August, 2021.


ROBERT S. LASNIK
UNITED STATES DISTRICT JUDGE